TONI H. WHITE (SBN 210119) ATTORNEY AT LAW P.O. Box 1068 2 Placerville, CA 95667 Telephone: (530) 885-6244 3 4 5 Attorney for Defendant RAMEŠH BIRLA 6 7 IN THE UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 11 UNITED STATES OF AMERICA, CASE NO. 2:23-CR-00094 DJC 12 Plaintiff. STIPULATION TO CONTINUE 13 STATUS CONFERENCE ORDER v. 14 RAMESH BIRLA, 15 Defendant 16 17 Defendant RAMESH BIRLA, by and through his counsel of record, TONI WHITE, and the GOVERNMENT, by and through Assistant United States Attorney ADRIAN KINSELLA hereby 18 stipulate as follows: 19 20 1. By previous order, this matter was set for status conference on October 23, 2025. 2. By this stipulation, defendant now moves to continue the status conference until 21 December 11, 2025, at 9:00 a.m., and to exclude time between October 23, 2025 and 22 December 11, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. 23 3. The parties agree and stipulate, and request that the Court find the following: 24 a) Discovery associated with this case includes over 35 gigabytes of evidence in 25 electronic form, including: investigative reports and related documents, covertly 26 recorded videos, pictures, and calls; recorded statements by the defendants and 27

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other witnesses, and other evidence. Many of the audio recordings are in the

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Punjabi language. Additional discovery consists of data and downloads of multiple cell phones. Defense counsel has represented that she needs the aid of two experts in case evaluation and preparation for trial and that neither expert is available until CJA funding is restored. As such, additional time is needed to evaluate potential defenses and prepare for trial or resolution.

- b) The Government does not object to the continuance.
- Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of October 23, 2025 to December 11, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
- 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act may exclude additional time periods from the period within which trial must begin.

IT IS SO STIPULATED.

ERIC GRANT Dated: October 19, 2025

United States Attorney

By: /s/ Adrian Kinsella ADRIAN KINSELLA Assistant U.S. Attorney

For the United States

1	Dated: October 19, 2025	By: <u>/s/ Toni White</u> TONI WHITE
2		For Defendant Ramesh Birla
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6	<u>ORDER</u>	
7	IT IS SO FOUND AND ORDERED this 20 ^t	h day of October, 2025.
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9	Dated: October 20, 2025	/s/ Daniel J. Calabretta
10		THE HONORABLE DANIEL J. CALABRETTA UNITED STATES DISTRICT JUDGE
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